

Penelope S. Strong
PENELOPE STRONG LAW FIRM
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ATTORNEY FOR DEFENDANT

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

UNITED STATES OF AMERICA,)	
)	CR 18-105-BLG-DLC
Plaintiff,)	
)	NOTICE OF INTENT TO
v.)	ASSERT DEFENSE OF
)	ENTRAPMENT BY
STETSON LEE HINEBAUCH)	ESTOPPEL
)	
Defendant.)	
)	

NOW COMES the Defendant, Stetson Lee Hinebauch and by and through his attorney, pursuant to F.R.Crim. Pro 12.3, and hereby provides notice of his intent to assert a defense of entrapment by estoppel, as to Count I, of the Indictment, pursuant to Fifth Amendment of the U.S. Constitution, the Due Process Clause, and the case law authority of *U.S. v. Batterjee*, 361 F 3d 1210 (9th Cir. 2004).

The Defendant further states that the Bureau of Alcohol, Firearms, Tobacco and Explosives, is the law enforcement agency involved. Further, that the authorized agent of the federal government was the licensed firearms dealer, to wit,

First National Pawn and its designees and employees, at 635 Wicks Lane, Billings, MT.

The relevant time period during which this defense applies is approximately May 23, 2018, through June 27, 2018.

DATED this 30st day of November, 2018.

By: /s/ Penelope S. Strong
Penelope S. Strong
Penelope Strong Law Firm
Attorney for Defendant

CERTIFICATE OF SERVICE

L.R. 5.2 (b)

I hereby certify that on November 30, 2018, a copy of the above-entitled document was served by the following means:

X CM/ ECF
____ Hand Delivery

1. Clerk, U. S. District Court
2. Thomas Godfrey
Assistant U.S. Attorney
U.S. Attorney's Office
2601 Second Ave. N., Suite 3200
Billings, MT 59101

By: /s/ Penelope S. Strong
Penelope S. Strong
Penelope Strong Law Firm
Attorney for Defendant